

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GIDEON RAPAPORT,

Plaintiff,

- vs. -

ABIGAIL FINKELMAN,

Defendant.

No.: 1:24-cv-05942 (JGLC)

**REPLY DECLARATION OF MAX RODRIGUEZ, ESQ. IN FURTHER SUPPORT OF
DEFENDANT ABIGAIL FINKELMAN'S MOTION TO DISMISS
WITH PREJUDICE FOR FAILURE TO STATE A CLAIM**

MAX RODRIGUEZ, pursuant to 28 U.S.C. § 1746(2), declares as follows:

1. I am a Principal in the law firm Law Office of Max Rodriguez PLLC, counsel for defendant Abigail Finkelman in the above-captioned action. I submit this reply declaration in further support of Ms. Finkelman's motion to dismiss the complaint with prejudice.

2. Attached as **Exhibit 1** is a true and correct copy of an email chain between Gideon Rapaport and myself dated October 31 – November 4, 2024.

3. Attached as **Exhibit 2** is a true and correct copy of a continuation of the email chain in Exhibit 1 between Gideon Rapaport and myself dated November 4, 2024.

Dated: November 13, 2024
New York, New York

LAW OFFICE OF MAX RODRIGUEZ PLLC

By: /s/ Max Rodriguez

Max Rodriguez
575 5th Avenue
14th Floor
New York, NY 10017
(646) 741-5167
max@maxrodriguez.law
Attorney for Defendant Abigail Finkelman